



Infrastructure · Water · Environment · Buildings

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ENVIRONMENT

Subject:

Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3 Progress Report (February 2013)

Date:

March 7, 2013

Dear Mr. Krawczyk:

Contact:

Patrick McGuire

Phone:

315.671.9233

Email:

Pat.McGuire@arcadis-us.com

Our ref:

B0064583.0004.00675
#5

On behalf of Georgia-Pacific LLC (Georgia-Pacific), attached is the February 2013 Monthly Progress Report for the King Highway Landfill Operable Unit 3 (KHL OU) of the Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site (Site) as per Section XVI of the Administrative Order by Consent (AOC) for the Remedial Design/ Remedial Action at the KHL OU, as was fully executed on February 8, 2000. Please note, however, pursuant to Section XVI of the AOC, after a Certificate of Completion of Construction is issued by the Michigan Department of Environmental Quality (MDEQ), as provided in Section XXVII (Certificate of Completion of Construction) of the AOC, reports documenting operation, maintenance, and monitoring activities shall be submitted pursuant to the schedule set forth in the Operation and Maintenance Plan.

If you have any questions, please do not hesitate to contact me.

Sincerely,

ARCADIS

Patrick McGuire
Principal Environmental Engineer

Attachment

Copies:

Garry Griffith, P.E., Georgia-Pacific LLC
Daria Devantier, Michigan Department of Environmental Quality
Michael Berkoff, USEPA Region 5
Dawn Penniman, P.E., ARCADIS

**PROGRESS REPORT FOR THE ALLIED PAPER, INC./PORTAGE CREEK/
KALAMAZOO RIVER SUPERFUND SITE
KING HIGHWAY LANDFILL OPERABLE UNIT 3**

FEBRUARY 2013

PREPARED MARCH 7, 2013

ON BEHALF OF GEORGIA-PACIFIC LLC

SUBMITTED TO

**KEITH KRAWCZYK, PROJECT COORDINATOR
REMEDIATION AND REDEVELOPMENT DIVISION**

MICHIGAN DEPARTMENT OF ENVIRONMENTAL QUALITY

Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
February 2013 Monthly Progress Report

Remedial Activities

- On February 5, Georgia-Pacific distributed an invite to MDEQ to participate in a conference call on February 11, 2013 to discuss select comments on the DRAFT FINAL *Report for Completion of Construction* (Completion Report; dated December 18, 2012), DRAFT FINAL *Operation and Maintenance Plan* (O&M Plan; dated December 18, 2012), Flow Reversal Determination Technical Memorandum dated December 19, 2012, and outstanding landfill gas migration issues.
- On February 6, ARCADIS, on behalf of Georgia-Pacific, submitted to MDEQ the January 2013 Monthly Progress Report.
- On February 8, Georgia-Pacific transmitted a list of questions on select comments included in MDEQ's January 31, 2013 letter for discussion during the conference call scheduled for February 11, 2013.
- On February 11, Georgia-Pacific transmitted a set of figures to MDEQ showing the plan and profile of gas probes GW-14 and GW-15 to facilitate discussion during the conference call scheduled for that same day.
- On February 11, Georgia-Pacific, ARCADIS, and MDEQ participated in a conference call to discuss Georgia-Pacific's questions on select comments included in MDEQ's January 31, 2013 letter.
- On February 13 and 14, Georgia-Pacific and MDEQ were in communication regarding the inclusion of the entire parcel around the Mill Lagoons 1, 2, 3, 4, and 5 as the restricted area under the Restrictive Covenant.
- On February 17, ARCADIS distributed to MDEQ proposed specifications for the permanent markers to be placed at the KHL in accordance with the 1998 Record of Decision.
- On February 27, ARCADIS distributed to MDEQ the revised figures to be included in the Completion Report for discussion during the conference call/meeting scheduled for that same day.
- On February 27, Georgia-Pacific, MDEQ, ARCADIS, and CDM Smith participated in a live meeting to discuss MDEQ's January 31, 2013 comment letter. Based on the discussions during and in follow up to the February 27, 2013 live meeting, it is Georgia-Pacific's understanding that with resolution of the two remaining O&M Plan items, MDEQ and Georgia-Pacific have reached an agreement on Deliverable 12 – *Report for Completion of Construction* and Deliverable 14 – *Operation and Maintenance Plan*.
- On February 28, ARCADIS redistributed the February 17, 2013 permanent marker specifications to MDEQ.

**Georgia-Pacific LLC
Allied Paper, Inc./Portage Creek/Kalamazoo River Superfund Site
King Highway Landfill Operable Unit 3
February 2013 Monthly Progress Report**

Operation, Maintenance, and Monitoring Activities

- On February 5, Georgia-Pacific contacted MDEQ to confirm that inspections of the KHL are required on a semi-annual basis in accordance with the revised O&M Plan.
- On February 12, ARCADIS contacted MDEQ to confirm that the gas vents at the KHL did not require monitoring during the 2013 1st quarter landfill gas monitoring event in accordance with the revised O&M Plan.
- On February 15, ARCADIS contacted MDEQ to reschedule the 2013 1st quarter landfill gas monitoring event for February 21 due to illness of the ARCADIS field technician scheduled to perform the event.
- On February 21, ARCADIS conducted the 2013 1st quarter landfill gas monitoring event at the KHL.

Upcoming Activities

- In March, ARCADIS will submit the 2013 1st quarter landfill gas monitoring report to MDEQ.
- In March, Georgia-Pacific anticipates that the remaining O&M Plan items will be agreed to and the Completion Report and O&M Plan documents will be finalized and resubmitted to MDEQ for review and approval.
- In March, Georgia-Pacific anticipates that the MDEQ will hold a SRT meeting to review the site closure.
- In March, Georgia-Pacific anticipates that the Flow Reversal Determination Technical Memorandum will be revised based on discussions during the February 27, 2013 live meeting and resubmitted to MDEQ for review and approval.
- In March, Georgia-Pacific anticipates that the Restrictive Covenant and associated easements and access agreements will be finalized.
- In March, Georgia-Pacific will submit a plan for investigating and mitigating the elevated concentrations of methane gas (i.e., above the lower explosive limit) at permanent perimeter gas probes GW-13 and GW-14 in accordance with the O&M Plan.
- In March, Georgia-Pacific will resubmit the proposed specifications for the permanent markers to be placed at the KHL in accordance with the Restrictive Covenant.